

## REMARKS

Claims 1, 5, 6, 8, 10, 11, 13 and 14 stand rejected under 35 U.S.C. §102(b) as being anticipated by United States Patent No. 4,722, 378 to Carolla et al. Applicant respectfully traverses this rejection.

Applicant respectfully submits that the Carolla et al. reference fails to disclose a tire in which, *inter alia*, the claimed ratio of depths  $d/D$  is between 0.02 to 0.1, "such that the vehicle sidewall surface of the second land portion has a height that is less than that of the wall of the main groove that faces the vehicle outer sidewall surface of the second land portion," as now recited in amended independent Claims 1 and 8. Such a configuration results in more even distribution of the ground contact pressure on the second land portion when turning because high ground contact pressure on the outer edge of the second land is avoided. Thus, uneven wear is reduced. Further, turning performance is improved because the inner side edge of the second land will not lift or slide during turning, which previously could have resulted from the high pressure on the outer side edge of the second land.

For example, Applicants' Figure 2 embodiment is one example of an embodiment that satisfies Claim 1, where Figure 2 shows depth "d" is a depth measured from a tread surface C0 to an intersection of the circular arc C2 located closest to the vehicle outer side M (Figure 1) with a vehicle outer sidewall surface 3y of the second land portion 3A, and depth "D" is the groove depth of the main groove 2, measured from a wall of the main groove 2 that faces the vehicle outer sidewall surface 3y [i.e., the right side wall of groove 2, because this is the wall that faces outer sidewall surface 3y] such that the vehicle outer

sidewall surface 3y of the second land portion 3A has a height that is less than that of the wall of the main groove 2 that faces the vehicle outer sidewall surface [i.e., the right side wall of groove 2, because this is the wall that faces outer sidewall surface 3y]. In other words, the inner wall 3y of the groove 2 that is between the first and second lands on the outer side of the tire is of a lower height than the outer wall of this same groove.

In contrast, the device of Carolla et al. fails to disclose a configuration in which the claimed ratio of depths  $d/D$  is between 0.02 to 0.1, and "the vehicle sidewall surface of the second land portion has a height that is less than that of the wall of the main groove that faces the vehicle outer sidewall surface of the second land portion," as now recited in amended independent Claim 1. Instead of having a groove with walls of different heights, the tire of the Carolla et al. reference includes grooves where the heights of the inner and outer walls are equal.

Similarly, the Carolla et al. reference also fails to disclose or suggest the invention defined in independent Claim 8, which also includes the claimed range of 0.02 to 0.1 for the ratio  $d/D$ , and the feature related to the groove walls being of different heights, except in Claim 8, the configuration of the outer end of the second land is defined as being a "curved line" (instead of a "second circular arc," as recited in Claim 1). One example of an embodiment of the invention defined in Claim 8 is shown in Applicant's Figure 4.

Accordingly, for at least these reasons, Applicant respectfully requests the withdrawal of this §102(b) rejection of independent Claims 1 and 8 and associated dependent Claims 5, 6, 10, 11, 13 and 14.

Claims 1, 3-8 and 10-12 stand rejected under 35 U.S.C. §103 as being unpatentable over Carolla et al. in view of United States Patent No. 5,355, 922 to Kogure et al. Applicant respectfully traverses this rejection.

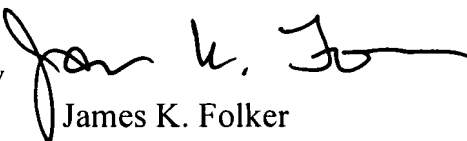
Applicant respectfully submits that the cited references fail to disclose or suggest all of the features of the claimed invention. More specifically, Applicant respectfully submits that the cited references fail to disclose or suggest, *inter alia*, the claimed relative heights of the outer sidewall surface of the second land portion with respect to the wall of the groove facing the outer sidewall surface in which the height of the outer sidewall surface is less than the height of the wall facing the outer sidewall surface (i.e., the groove outside the second land has an inner wall of a height less than its outer wall). As discussed above, the Carolla et al. reference fails to disclose this feature. The Carolla et al. reference also fails to suggest this feature. Moreover, the Kogure et al. reference also fails to disclose or suggest this feature, and the Examiner did not rely upon the Kogure et al. reference for this feature. Accordingly, for at least these reasons, Applicant respectfully requests the withdrawal of this §103 rejection of independent Claims 1 and 8, and associated dependent Claims 3-7 and 10-14, under Carolla et al. and Kogure et al.

Claims 1-14 stand rejected under 35 U.S.C. §103 as being unpatentable over Carolla et al. in view of United States Patent No. 5,720,831 to Aoki et al. and United States Patent Application Publication No. 2001/054464 to Tozawa et al. Applicant respectfully traverses this rejection.

Applicant respectfully submits that the cited references fail to disclose or suggest all of the features of the claimed invention. More specifically, Applicant respectfully submits that the cited references fail to disclose or suggest the *inter alia*, the claimed configuration resulting in the groove outside the second land having an inner wall of a height less than its outer wall, as recited in independent Claims 1 and 8. As discussed above, the Carolla et al. reference does not disclose or suggest this feature. Additionally, the Aoki et al. reference and the Tozawa et al. reference also fail to disclose or suggest this feature, and instead each of these references include grooves with walls of equal heights. Accordingly, for at least these reasons, Applicant respectfully requests the withdrawal of this §103 rejection of independent Claims 1 and 8 and associated dependent Claims 2-7 and 9-14.

For all of the above reasons, Applicant requests reconsideration and allowance of the claimed invention. Should the Examiner be of the opinion that a telephone conference would aid in the prosecution of the application, or that outstanding issues exist, the Examiner is invited to contact the undersigned.

Respectfully submitted,  
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